

Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

BOMBARDIER INC.,

Plaintiff,

v.

MITSUBISHI AIRCRAFT CORPORATION,  
MITSUBISHI AIRCRAFT CORPORATION  
AMERICA INC., AEROSPACE TESTING  
ENGINEERING & CERTIFICATION INC.,  
MICHEL KORWIN-SZYMANOWSKI,  
LAURUS BASSON, MARC-ANTOINE  
DELARCHE, CINDY DORNÉVAL, KEITH  
AYRE, AND JOHN AND/OR JANE DOES 1-  
88,

Defendants.

No. 2:18-cv-01543-JLR

DECLARATION OF BORIS  
MEISLITZER IN SUPPORT OF  
BOMBARDIER INC.'S REPLY TO  
DEFENDANT'S KEITH AYRE  
AND MARC-ANTOINE  
DELARCHE'S OPPOSITION TO  
BOMBARDIER INC.'S UPDATED  
MOTION FOR PRELIMINARY  
INJUNCTION AGAINST  
MITSUBISHI AIRCRAFT  
CORPORATION, MARC-  
ANTOINE DELARCHE, AND  
KEITH AYRE

**NOTE ON MOTION  
CALENDAR:  
MAY 17, 2019**

I, Boris Meislitzer, declare as follows:

1. I am an individual and over the age of twenty one. I have personal knowledge of the matters addressed herein.

2. This declaration is being submitted in support of Bombardier Inc.'s ("Bombardier's") Reply to Defendants Keith Ayre and Marc-Antoine Delarche's Opposition to

1 Bombardier's Updated Motion for Preliminary Injunction Against Mitsubishi Aircraft  
2 Corporation ("MITAC"), Marc-Antoine Delarche, and Keith Ayre.

3 3. I am currently Section Chief for Air Systems and Fire Detection and  
4 Extinguishing ("FIDEEX" or "FIDEX") at Bombardier. I have held the Section Chief role since  
5 2009.

6 4. I earned a Bachelor of Engineering degree in aerospace from the University of  
7 Applied Sciences Aachen in Germany in 1992. Following that, I worked for the German  
8 Aerospace Center until 1998, and then joined Fairchild Dornier as an engineer in 1999 and was  
9 employed there until 2002.

10 5. In 2002, I joined Bombardier. That was also the year I met Keith Ayre; Mr. Ayre  
11 hired me into the role of engineering specialist in the pneumatics department, where he was  
12 Section Chief at the time. I reported to Mr. Ayre for several years when I first joined the  
13 company.

14 6. When Mr. Ayre left the company, in August 2016, he was a Principal  
15 Engineering Specialist for pneumatics. We collaborated on different projects related to different  
16 systems in various aircraft, but I was not reporting to him or vice-versa. When he left the  
17 company, Mr. Ayre reported to Mathieu Guenette, a Manager. I recall that a "handover  
18 meeting" took place for Mr. Ayre on August 26, 2016. I called the meeting, and there was a  
19 short agenda related to maintaining continuity for Mr. Ayre's deliverables and responsibilities.  
20 This was an informal meeting intended to ensure that any remaining responsibilities that Mr.  
21 Ayre had at Bombardier would be sufficiently covered when he left the company.

22 7. I have searched my records and was able to locate an Outlook calendar  
23 invitation. I recall that the meeting took place from 10:30-11:30 a.m. To the best of my  
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1 recollection, aside from myself and Mr. Ayre, the others in attendance were Jean Brousseau,  
2 Mario Roma and Carlos Lima.

3 8. I have not heard of anyone sending him or herself documents in preparation for  
4 this "handover" meeting. I do not have any information as to the reason that Mr. Ayre may have  
5 sent himself Bombardier documents in preparation for the handover meeting on August 26.  
6

7 9. I have reviewed several emails that Mr. Ayre sent to himself. I do not recall  
8 seeing those emails or documents previously, and I cannot make a connection between any of  
9 the emails and any of the projects we were working on at the time of his departure.  
10

11 10. To the best of my knowledge and recollection, and based on a review of my  
12 records, Mr. Ayre did not have deliverables due in the area of FIDEEX when he departed  
13 Bombardier.

14 11. To the best of my knowledge and recollection, during the handover meeting we  
15 did not discuss issues or open work tasks related to FIDEEX systems, smoke generators, or  
16 smoke detection or testing systems.  
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1 I declare under penalty of perjury under the laws of the United States of America that  
2 the foregoing is true and correct.

3 *St. Laurent*  
4 EXECUTED at \_\_\_\_\_, this 17 day of May, 2019.

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8 Boris Meislitzer  
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# CERTIFICATE OF SERVICE

I hereby certify that on May 17, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Jerry A. Riedinger  
PERKINS COIE LLP  
Email:  
JRiedinger@perkinscoie.com  
m  
docketsea@perkinscoie.com  
lshaw@perkinscoie.com  
sporter@perkinscoie.com

Mack H. Shultz  
PERKINS COIE LLP  
Email:  
MShultz@perkinscoie.com  
docketseapl@perkinscoie.com  
m  
sbilger@perkinscoie.com

Mary Z. Gaston  
PERKINS COIE LLP  
Email:  
MGaston@perkinscoie.com  
docketsea@perkinscoie.com  
m  
jstarr@perkinscoie.com

James Sanders  
PERKINS COIE LLP  
Email:  
JSanders@perkinscoie.com  
RBecken@perkinscoie.com  
docketsea@perkinscoie.com  
jdavenport@perkinscoie.com  
m

Shylah R. Alfonso  
PERKINS COIE LLP  
Email:  
SAlfonso@perkinscoie.com  
docketsea@perkinscoie.com

Attorneys for Mitsubishi Aircraft Corporation and Mitsubishi Aircraft Corporation America Inc.

Richard J. Omata  
KARR TUTTLE CAMPBELL  
Email: romata@karrtuttle.com  
jnesbitt@karrtuttle.com  
swatkins@karrtuttle.com

Mark A. Bailey  
KARR TUTTLE CAMPBELL  
Email: mbailey@karrtuttle.com  
jsmith@karrtuttle.com  
mmunhall@karrtuttle.com  
sanderson@karrtuttle.com

Daniel T. Hagen  
KARR TUTTLE CAMPBELL  
Email: dhagen@karrtuttle.com  
ksagawinia@karrtuttle.com

Attorneys for Aerospace Testing Engineering & Certification Inc., Michel Korwin-Szymanowski, Laurus Basson, and Cindy Dornéval

1 James P. Savitt Jacob P. Freeman  
2 SAVITT BRUCE & SAVITT BRUCE &  
3 WILLEY LLP WILLEY LLP  
4 Email: jsavitt@sbwLLP.com Email:  
eservice@sbwllp.com jfreeman@sbwLLP.com

5 Attorneys for Marc-Antoine Delarche and Keith Ayre

6 s/John D. Denkenberger

7 John D. Denkenberger, WSBA No.: 25,907

8 Brian F. McMahon, WSBA No.: 45,739

9 E. Lindsay Calkins, WSBA No.: 44,127

Christensen O'Connor Johnson Kindness<sup>PLLC</sup>

1201 Third Avenue, Suite 3600

Seattle, WA 98101-3029

Telephone: 206.682.8100

Fax: 206.224.0779

E-mail: john.denkenberger@cojk.com,

brian.mcmahon@cojk.com,

lindsay.calkins@cojk.com, litdoc@cojk.com

*Attorneys for Plaintiff Bombardier Inc.*